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4312 RF 93

DUE DATE 10-8-93

States Government

Department of Energy

Rocky Flats Office

# memorandum

SEP 29 1 07 PM '93

ACTION Hutchins

| DIST              | LTR                                 | ENC                                 |
|-------------------|-------------------------------------|-------------------------------------|
| BENEDETTI, R.L.   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| BENJAMIN, A.      | <input type="checkbox"/>            | <input type="checkbox"/>            |
| BERMAN, H.S.      | <input type="checkbox"/>            | <input type="checkbox"/>            |
| CARNIVAL, G.J.    | <input type="checkbox"/>            | <input type="checkbox"/>            |
| COPP, R.D.        | <input type="checkbox"/>            | <input type="checkbox"/>            |
| CORDOVA, R.C.     | <input type="checkbox"/>            | <input type="checkbox"/>            |
| DAVIS, J.G.       | <input type="checkbox"/>            | <input type="checkbox"/>            |
| FERRERA, D.W.     | <input type="checkbox"/>            | <input type="checkbox"/>            |
| FRANZ, W.A.       | <input type="checkbox"/>            | <input type="checkbox"/>            |
| HANNI, B.J.       | <input type="checkbox"/>            | <input type="checkbox"/>            |
| HEALY, T.J.       | <input type="checkbox"/>            | <input type="checkbox"/>            |
| HEDAH, T.G.       | <input type="checkbox"/>            | <input type="checkbox"/>            |
| HILBIG, J.G.      | <input type="checkbox"/>            | <input type="checkbox"/>            |
| KIRBY, W.A.       | <input type="checkbox"/>            | <input type="checkbox"/>            |
| KUESTER, A.W.     | <input type="checkbox"/>            | <input type="checkbox"/>            |
| MANN, H.P.        | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| MARX, G.E.        | <input type="checkbox"/>            | <input type="checkbox"/>            |
| McKENNA, F.G.     | <input type="checkbox"/>            | <input type="checkbox"/>            |
| MORGAN, R.V.      | <input type="checkbox"/>            | <input type="checkbox"/>            |
| PIZZUTO, V.M.     | <input type="checkbox"/>            | <input type="checkbox"/>            |
| POTTER, G.L.      | <input type="checkbox"/>            | <input type="checkbox"/>            |
| RILEY, J.H.       | <input type="checkbox"/>            | <input type="checkbox"/>            |
| SANDLIN, N.B.     | <input type="checkbox"/>            | <input type="checkbox"/>            |
| SATTERWHITE, D.G. | <input type="checkbox"/>            | <input type="checkbox"/>            |
| SCHUBERT, A.L.    | <input type="checkbox"/>            | <input type="checkbox"/>            |
| SETLOCK, G.H.     | <input type="checkbox"/>            | <input type="checkbox"/>            |
| SULLIVAN, M.T.    | <input type="checkbox"/>            | <input type="checkbox"/>            |
| SWANSON, E.R.     | <input type="checkbox"/>            | <input type="checkbox"/>            |
| WILKINSON, R.B.   | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| WILSON, J.M.      | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

SEP 24 1993

ERD:SRG:11270

Operable Unit 2 Subsurface IM/IRA Schedule Extension

Ned Hutchins, Acting Associate General Manager  
Environmental Restoration Management  
EG&G Rocky Flats, Inc.

In a September 16, 1993 letter (attached), EPA and CDH granted a five week schedule extension for the Operable Unit 2 (903 Pad, Mound, and East Trenches) Subsurface Interim Measure/Interim Remedial Action startup, or October 22, 1993. Their letter indicates that the Non Aqueous Phase Contamination (NAPL) falls within the range of **expected conditions** as shown in the Final Pilot Test Plan for test site 1. In the meeting with EPA/CDH on September 21, 1993, they gave us clarification that we must convince them that the occurrence of the NAPL and its affect on the off-gas treatment system was "**not reasonably foreseeable**." Otherwise, they would not be willing to grant any further extension to the October 22, 1993 date.

We repeat our statement in our August 16, 1993 memorandum (ERD:SRG:09615) to you: "EG&G must quickly determine the impacts of the occurrence of the NAPL to the location and design of the Subsurface IM/IRA at this test site location". In addition, you must present your case that this problem was **not reasonably foreseeable**. Failure to do so puts us at risk for non-compliance with the InterAgency Agreement and subject to stipulated penalties. If we need additional time to modify the system and/or address safety concerns, and are unable to get additional schedule relief, we may be in non-compliance with the IAG. Be advised that EG&G will be held accountable for any stipulated penalties associated with this issue.

If we need to request additional time, we need to have a schedule extension request to EPA and CDH two weeks before October 22 or October 8, 1993. Therefore, you must determine alternatives, so that we can meet with EPA and CDH in advance of the October 8, 1993 date.

If you have any questions about this, please contact Scott Grace at extension 7199.

|                |                                     |                                     |
|----------------|-------------------------------------|-------------------------------------|
| CORRES CONTROL | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| FATS/T130G     | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Adm Rec        | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

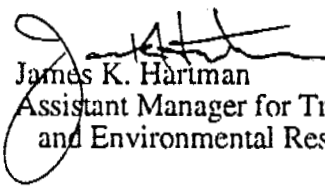
Reviewed for Addressee  
Corres. Control RFP

9-29-93  
DATE BY

Ref Ltr. #  
3647 RF 93

DOE ORDER # 5400

Attachment

  
James K. Hartman  
Assistant Manager for Transition  
and Environmental Restoration

cc w/Attachment:  
A. Rampertaap, EM-453  
H. Mann, EG&G  
R. Benedetti, EG&G  
W. Busby, EG&G  
A. Primrose, EG&G  
T. Greengard, EG&G  
M. Klein, EG&G



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

SEP 16 1993

Ref: 8HWM-FF

Mr. Richard Schassburger  
Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

re: OU 2 Subsurface IM/IRA

Dear Mr. Schassburger:

EPA and CDH have reviewed the request for an extension on the September 15, 1993 deadline for start up of the SVE Pilot Tests at Site 1 submitted on August 27, 1993 (93-DOE-09970). Our review of the information submitted in support of this request indicates the contamination encountered at Site 1 falls within the range of expected conditions as shown in the Final Pilot Test Plan. This being the case, it is not at all clear why the system is incapable of handling them. However, we are hereby granting approval of the requested extension to October 22, 1993 so a clear determination of the situation can be made and agreement reached among all parties as to what if any changes are required. Any additional extensions will be considered separately, pending our review of current conditions.

We would like to meet with you to discuss how to proceed with the Subsurface IM/IRA as soon as possible. We feel the extra time now available should be used to evaluate not only modification of the SVE tests, but also to consider possible expedited actions to deal with the contamination encountered at IHSS 110 so it does not cause further problems.

We will continue to work with Mr. Scott Grace of your staff to resolve the concerns raised in order that the Subsurface IM/IRA can proceed as scheduled. If you have questions or would like to discuss the progress of this effort, please contact Bill Fraser (EPA) at 294-1081 or Joe Schieffelin (CDH) at 692-3356.

Sincerely,

Martin Hestmark, EPA  
Manager  
Rocky Flats Project

for Gary Baughman, CDH  
Chief  
Facilities Section  
Hazardous Waste Control Program

cc: Scott Grace, DOE  
Joe Schieffelin, CDH